

13  
SEP 20 1993

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Article Number: P 376 153 435

Mr. Ronald J. Clouse  
Mackey Envelope Corporation  
Box 617, Harvey Road, Hays Industrial Park  
Mt. Pleasant, Iowa 52641

Dear Mr. Clouse:

Re: Mackey Envelope Corporation  
Mt. Pleasant, Iowa  
EPA RCRA ID No. IAD098721517

Letter of Warning

On August 19, 1991, a representative of the U. S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA).

My staff has reviewed the inspection report and your August 23, 1991, response to the Notice of Violation and has determined that violations of RCRA remain unaddressed.

Enclosed is a list of violations. Please carefully read this list and correct these violations. While you are not required to submit anything at this time, you are responsible for correcting these violations. Should EPA discover that these violations continue to exist, your facility could be subject to an enforcement action which may contain substantial penalties. The penalties sought in such an enforcement action can be up to \$25,000 per violation per day of non-compliance.

If there are any questions regarding this matter, please contact Ms. Lynn Slugantz at (913) 551-7883.

Sincerely yours,

James V. Callier  
Chief, Iowa Section  
RCRA Branch

Enclosure

cc: Joseph Obr, IDNR (w/ encl)

RCRA:IOWA:ANSLYN\DISC-ANSLYN:SL:MCKAY;jah:9-2-93

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|----------|----------|------|---------|
| AARP\SEE | IOWA     | IOWA | IOWA    |
| ANSLYN   | SLUGANTZ | LAHM | CALLIER |

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9-1-93*

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9/20/93*



R00173663  
RCRA RECORDS CENTER

**Violations noted during the August 19, 1991 inspection at Mackey Envelope Corporation**

1. Failure to make a hazardous waste determination on the spent solvent soaked shop rags, waste paper towels soaked with solvent, spent filter media from the lithograph fountain solution, and sludge from the parts washer, as required by Title 40 Code of Federal Regulations (CFR) § 262.11.
2. Failure to date, label and close the waste ink drums during storage, as required by 40 CFR § 262.34(a)(3), § 262.34(a)(4), and § 265.173(a).
3. Failure to have a hazardous waste management training program, as required by 40 CFR § 265.16(d).
4. Failure to have a communication or alarm system at the hazardous waste storage area, as required by 40 CFR § 265.34.
5. Failure to have a hazardous waste contingency plan, as required by 40 CFR § 265.51(a).

After further review of the inspection report, the following possible violations of RCRA have been determined:

- a. Failure to provide documentation of restricted waste notification of the waste ink, as required by 40 CFR § 268.7.
- b. Failure to inspect waste containers in storage areas, as required by 40 CFR § 265.174.

With regard to your facility's failure to have a communication or alarm system at the hazardous waste storage area, the EPA suggests that two or more people be involved in the handling of hazardous waste. This would allow for immediate access to communication and/or alarm systems in the case of an emergency, as required under 40 CFR § 265.34.

**Compliance Actions**

1. Pursuant to 40 CFR § 262.11, a hazardous waste determination must be performed, including the U.S. EPA hazardous waste code if applicable, for the spent solvent soaked shop rags, waste paper towels soaked with solvent, spent filter media from the lithograph fountain solution, and sludge from the parts washer. These determinations must be performed on materials as generated and before any treatment method is performed. In making the determination you should consider the following:



- a. A description of the process that generated the waste;
  - b. A determination of whether or not the waste has been excluded from regulation under 40 CFR Part 261;
  - c. A determination of whether or not the waste has been listed in Subpart D of 40 CFR Part 261; and
  - d. A determination of whether or not the waste is identified in 40 CFR Part 261 Subpart C. To determine whether the waste fails any of the characteristics in Subpart C, the waste may need to be analyzed using the procedures set forth in Subpart C of 40 CFR Part 261, or by applying knowledge of the waste characteristics based upon the materials or processes used.
2. Compliance with 40 CFR § 262.34(a)(3), § 262.34(a)(4), and § 265.173(a) indicating that the waste ink drums are dated, labeled and closed during storage.
3. Maintain documentation of your facility's hazardous waste management training program, as required by 40 CFR § 265.16(d).
4. Maintain a copy of your contingency plan. This plan is required by 40 CFR Part 265, Subpart D.
5. The contingency plan must be submitted to the local police department, fire department, hospital, and State and local emergency response teams that may be called upon to provide emergency services as required by 40 CFR § 262.34(a)(4) referencing 40 CFR § 265.53.
6. Maintain copies of restricted waste notifications on the waste ink. The notification is to comply with the requirements of 40 CFR § 268.7 for wastes shipped off site.
7. Maintain documentation of your facility's weekly inspection of the waste ink storage area, specifically the condition of the containers, as required by 40 CFR § 265.174.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

SEP 20 1993

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Mr. Ronald J. Clouse  
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Box 617, Harvey Road, Hays Industrial Park  
Mt. Pleasant, Iowa 52641

Dear Mr. Clouse:

Re: Mackey Envelope Corporation  
Mt. Pleasant, Iowa  
EPA RCRA ID No. IAD098721517

Letter of Warning

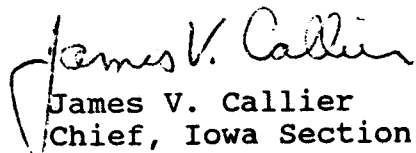
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United States Postal Service



Official Business



PENALTY FOR PRIVATE  
USE, \$300

Print your name, address and ZIP Code here

U.S. EPA Region VII  
RCRA Branch/IOWA Sec.  
726 Minnesota Ave.  
Kansas City, KS 66101

RA

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Ronald J. Clouse  
Mackey Envelope Corporation  
Box 617 Harvey Road, Hays Industrial Pk  
Mt. Pleasant, IA 52641

4a. Article Number

P 376 153 435

4b. Service Type

- ☒ Registered ☐ Insured  
☐ Certified ☐ COD  
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8. Addressee's Address (Only if requested and fee is paid)

5. Signature (Addressee)

6. Signature (Agent)

PS Form **3811**, October 1990

☆U.S. GPO: 1990-273-861

**DOMESTIC RETURN RECEIPT**



P 376 153 435



# Receipt for Certified Mail

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to **Mr. R.J. Clouse**  
**Mackey Envelope Corp.**  
Street and No.  
**Box 617, Harvey Road,**  
City, State and ZIP Code  
**Hays, Industrial Park**  
**Mt. Pleasant, Iowa 52641**

Postage

\$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing  
to Whom & Date Delivered

Return Receipt Showing to Whom,  
Date, and Addressee's Address

TOTAL Postage  
& Fees

\$

Postmark or Date

Form 3800, June 1991